

**U.S. Department of Justice**



*United States Attorney  
Eastern District of New York*

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AES:SCJ/PP  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 15, 2019

**BY GOVERNMENT PRIVILEGE REVIEW TEAM**  
**TO BE FILED UNDER SEAL**

**BY HAND & EMAIL**

The Honorable Vera M. Scanlon  
United States Magistrate Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (NGG) (S-1)

Dear Judge Scanlon:

In response to the Court's Order of April 12, 2019, the government respectfully states that the Court's Orders, filed at ECF Nos. 502, 505 and 507, with redacted copies filed at ECF Nos. 542, 543, and 544, have not rendered moot the government's request that redacted copies of the defendant Clare Bronfman's February 21, 2019 letter and the privilege review team's February 27, 2019 response be filed on the docket. For purposes of the record and to inform the trial team of the prior arguments raised and litigated, the government's position is that the submissions should be made available to the trial team to the extent possible without disclosing any privileged information. However, in light of the Court's Orders, the government has revised its proposed redactions. The revisions are

attached hereto as Exhibits A and B, and the government respectfully requests that this letter and the Exhibits be unsealed.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Shannon C. Jones  
Assistant U.S. Attorneys  
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cc: Kathleen E. Cassidy (by email)

# HAFETZ & NECHELES LLP

ATTORNEYS AT LAW

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April 16, 2019

**VIA ECF (Under Seal and Provided Only to Taint Team and the Court)**

Honorable Vera M. Scanlon  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Raniere, et al.*, 18-cr-204 (NGG)

Dear Judge Scanlon:

We write on behalf of defendant Clare Bronfman in response to AUSA Shannon Jones' April 15, 2019 Letter to the Court. (ECF No. 545). Defendant is amenable to making redacted copies of the February 21, 2019 and February 27, 2019 letters available to the trial team. Counsel is in agreement with the redactions Ms. Jones has proposed, but we believe a few additional redactions are necessary to be consistent with what Your Honor has already ordered in her April 12th Opinions. (See ECF Nos. 530 and 537). For example, the first paragraph on page ten of Bronfman's February 21, 2019 letter was quoted on page thirteen of Your Honor's Opinion (ECF No. 505), and Your Honor subsequently ordered it be redacted prior to the public filing of the opinion. The government's proposal submitted at ECF No. 545, Exhibit A, did not redact this portion of Defendant's February 21, 2019 letter.

We have included as Exhibit A and Exhibit B the February 21, 2019 and February 27, 2019 letters with our additional redactions highlighted in yellow. Defendant's proposed redactions are consistent with Your Honor's orders and we would consent to the public filing of Exhibits A and B with these additional redactions.

Respectfully submitted,

/s/

Kathleen E. Cassidy  
Caroline M. Grosshans

HAFETZ & NECHELES LLP

cc: AUSA Shannon Jones, Privilege Review Attorney (by email)  
AUSA Philip Pilmar, Privilege Review Attorney (by email)  
AUSA Alicia Washington, Privilege Review Attorney (by email)